pepco
Energy Services

Federal Express 8748 5419 8188

December 12, 2012

Ms. Ingrid H. Hopkins
Water Protection Division (3WP42)
US EPA – Region III
1650 Arch Street
Philadelphia, PA 19103-3029
(215) 814-5437
hopkins.ingrid@epa.gov

RE: Benning Road Generating Station – NPDES Permit No. DC 0000094
Metal Excursion – Outfall 013Q

Dear Ms. Hopkins,

This letter is a follow-up to the December 10, 2012 telephone notification, made on behalf of Pepco Energy Services, Inc. by Ms. Heather Brinkerhoff of HB Consulting LLC., to report daily maximum copper, iron and zinc excursions from a grab storm water sample taken on November 13, 2012 from Outfall 013.

On December 10, 2012 Ms. Brinkerhoff received the laboratory analysis indicating daily maximum concentrations for copper, iron and zinc were exceeded. Ms. Brinkerhoff made the required telephone notification per NPDES permit condition VI.6 to the USEPA.

Lab and field results indicated the following:

Analyte	Units	Permit Limit Daily Max	Results
Copper	ug/L	13.44	26
Iron	mg/L	1.0	1.2
Zinc	ug/L	117.18	210

Investigation of the metals excursions included a review of historical metal concentrations to obtain baseline storm water sample data. Specifically, storm water sample data gathered during the previous NPDES permit period for the Benning Road Generating Station indicates that the November 13, 2012 values are comparative to historical values, i.e. typical metal concentrations found in storm water samples dating back several years are similar to those seen in recent analysis.

On July 19, 2010, the facility submitted to EPA a TMDL Implementation Plan, as required by NPDES permit condition VII.E. The TMDL Plan provided information on past, current, and planned activities at

the facility to meet the required load reductions for the Anacostia River TMDLs for metals. EPA approved the plan and the facility has begun the implementation process, including taking baseline storm water samples from various locations throughout the facility to locate potential hot spots and increased metal infiltration to storm water.

The facility has located and the aforementioned hotspots and has continued the TMDL Implementation Plan process by installing drain screens to potentially help reduce any future metal excursions.

In addition, per Fariba Mahvis' EPA status report letter dated December 4, 2012 the following Phase I and Phase II control measures have been completed:

Phase I - Inlet Maintenance

- The implementation of Phase I control measures is now completed. Metal absorbing inlet guards have been installed at all storm drain inlets throughout the facility. As noted in the attached Table 8, there are six inlets where the configuration or design of them does not permit the placement of inlet guards.
- Heavy duty inlet guards are placed at areas where there are heavy traffics.
- Oil absorbing booms are in place around the majority of inlets, except in heavy traffic areas where it would be impractical to install them.

Phase II - Metal Management

- Stored metal in areas exposed to the weather is being removed from the site or covered up for protection from rainfall.
- We remain on schedule to have all Phase II control measures implemented by December 31, 2012.

Please contact me at (703) 253-1787 or by electronic mail at mwilliams@pepcoenergy.com if you need additional information.

Respectfully yours,

Michael V. Williams
Power Plant Asset Manager
Pepco Energy Services, Inc.